

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JOHN TURNER, et al	:	
	:	CIVIL ACTION
	:	
v.	:	NO. 04-cv-0936 (JJF)
	:	
	:	
B.V. SHIPPING COMPANY LUZON	:	
STRAIT (GRONINGEN)	:	

**DEFENDANT'S PROPOSED JURY QUESTIONNAIRE**

**Directions:** Your answer to each question must be unanimously decided by the jury. Please follow the directions as stated.

**QUESTION NO. 1 :** Was plaintiff John Turner's alleged accident caused solely by the negligence of the stevedore employer, Delaware River Stevedores, Inc., the negligence of plaintiff John Turner or the negligence of any of plaintiff's fellow Delaware River Stevedores, Inc. employees?

ANSWER : Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered Question No. 1 with a "Yes" do not answer any further questions.

**QUESTION NO. 2 :** Did the Defendant B.V. Shipping Company Luzon Strait (Groningen), owner of the M/V LUZON STRAIT, negligently breach the turnover duty?

ANSWER : Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered Question No. 2 with a "Yes" proceed to Question No. 3. If you answered Question No. 2 with a "No" do not answer any further questions.

**QUESTION NO. 3 :** Was the breach of the turnover duty by Defendant B.V. Shipping Company Luzon Strait (Groningen), owner of the M/V LUZON STRAIT, a legal cause of any injury to plaintiffs?

ANSWER : Yes:\_\_\_\_\_ No\_\_\_\_\_

If you answered Question No. 3 with a "Yes" proceed to Question No. 4. If you answered Question No. 3 with a "No" do not answer any further questions.

**QUESTION NO. 4 :** Was plaintiff John Turner guilty of some contributory negligence?

ANSWER : Yes:\_\_\_\_\_ No\_\_\_\_\_

If you answered Question No. 4 with a "No" do not answer Question No. 5 and go to Question No. 6; but if your answer to Question No. 4 is "Yes" then answer Question No. 5.

**QUESTION NO. 5 :** What degree (stated as a percentage) did John Turner's own negligence play in causing his injuries?

ANSWER : \_\_\_\_\_%

Go on to Question No. 6.

**QUESTION NO. 6 :** What amount do you find will fairly and adequately compensate the plaintiffs for the injuries that they sustained? (do not make a deduction based on any percentage of negligence attributed to John Turner here).

ANSWER : \$ \_\_\_\_\_

Respectfully submitted,

PALMER BIEZUP & HENDERSON LLP

By: /s/ Michael B. McCauley  
Michael B. McCauley, Esq. (ID # 2416)  
Attorneys for Defendant,  
B.V. Shipping Company Luzon Strait (Groningen)  
1223 Foulk Road  
Wilmington, DE 19803  
(302) 594-0895

Of Counsel:  
Richard Q. Whelan, Esq.  
Palmer Biezup & Henderson LLP  
956 Public Ledger Building  
620 Chestnut Street  
Philadelphia, PA 19106-3409

Dated: October 28, 2005